

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--------------------------------|---|------------------------------------|
| CLARK R. HUFFMAN, | : | |
| BRANDI K. WINTERS, | : | |
| PATRICIA L. GRANTHAM, | : | |
| and LINDA M. PACE, | : | |
| individually and on behalf of | : | |
| all others similarly situated, | : | |
| | : | |
| Plaintiffs, | : | |
| | : | |
| v. | : | Civil Action No. 2:10-CV-05135-JFL |
| | : | |
| THE PRUDENTIAL INSURANCE | : | |
| COMPANY OF AMERICA, | : | |
| | : | |
| Defendant. | : | |

**PLAINTIFFS' MOTION FOR ATTORNEY'S
FEES, EXPENSES AND INCENTIVE AWARDS**

Plaintiffs Clark Huffman, Patricia Grantham, Linda Pace, and Brandi Winters (“Class Representatives”), and their counsel (“Class Counsel”), respectfully move this Court for an Order: (1) awarding Class Counsel attorney’s fees from the Settlement Fund in the amount of \$3 million, (2) reimbursing Class Counsel for expenses they have incurred in this case in the amount of \$67,763, and (3) awarding the Class Representatives incentive awards in the amount of \$5,000 each to compensate them for their service on behalf of the Class. The factual and legal basis for these requests is set forth in a memorandum of law and declarations of Class Counsel that are being filed contemporaneously with this motion. The relief requested should be granted for the reasons stated therein.

Respectfully submitted,

/s/ Cary L. Flitter

Cary L. Flitter
Andrew M. Milz
Flitter Milz, P.C.
450 N. Narberth Avenue
Narberth, PA 19072
(610) 822-0789 tel
(610) 667-0552 fax
cflitter@consumerslaw.com
amilz@consumerslaw.com

John C. Bell, Jr.
Admitted *Pro Hac Vice*
Lee W. Brigham
Admitted *Pro Hac Vice*
Bell & Brigham
Post Office Box 1547
Augusta, Georgia 30903-1547
(706) 722-2014 tel
(706) 722-7552 fax
john@bellbrigham.com
lee@bellbrigham.com

M. Scott Barrett
Admitted *Pro Hac Vice*
Barrett Wylie LLC
520 North Walnut Street (47404)
P.O. Box 5233
Bloomington, IN 47407-5233
(812) 334-2600 tel
(812) 337-8850 fax
scott@barrettwylie.com

Stuart T. Rossman (BBO #430640)
Admitted *Pro Hac Vice*
The National Consumer Law Center
7 Winthrop Square, 4th Floor
Boston, MA 02110
(617) 542-8010 tel
(617) 542-8028 fax
srossman@nclc.org

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing **Plaintiffs' Motion for Attorneys' Fees, Expenses and Incentive Awards** to be served upon all counsel of record on February 15, 2019 via electronic mail and via the Court's electronic filing system which will cause an electronic copy of the document to be delivered to all counsel of record.

/s/ Cary L. Flitter
Cary L. Flitter
Flitter Milz, P.C.
450 N. Narberth Avenue
Narberth, Pennsylvania 19072
(610) 822-0782 tel
(610) 667-0552 fax
cflitter@consumerslaw.com

COUNSEL FOR PLAINTIFFS